

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re:

Todd A. Brunner and  
Sharon Y. Brunner,

Case No. 11-29064  
Chapter 11

Debtors.

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**OBJECTION TO RENEWED MOTION OF THE UNITED STATES TRUSTEE TO DISMISS**

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The Debtors hereby object to the renewed Motion of the United States Trustee to dismiss. Its grounds for the objection as are follows:

1. It is believed that Debtors now have insurance for the following properties identified in Paragraph 6 of the U.S. Trustee's Motion (see the Certificate of Insurance attached hereto). Of the vehicles listed in Paragraph 6 of the U.S. Trustee's Motion, the following vehicles are insured: 2006 Bentley, 1956 Chevrolet, 1937 Ford, 1996 Lincoln, 2005 Mitsubishi, 2003 Chevrolet, 2007 Dodge, 2006 Ford Pick-up, 2006 Ford Pick-up, 2000 Ford GMC, 1997 GMC, and 2000 Ford GMC truck. Mr. Brunner forgot to insure the Rolls Royce and the Harley Davidson Motorcycle, and will be able to obtain proof of insurance by August 15, 2011. He also forgot to insure the ATV, an item that it is not customary to insure. The 1997 Cadillac is damaged, the 1959 Jaguar is in parts, the 2002 Chevrolet van is blown up, and the 1918 electric car is in parts. The Debtors will either supply pictures or police reports regarding those items. With respect to the boats, the 1998 Chaparral and the 1993 Thundercat are insured. Because the 1996 Outer Limits is inoperable, Mr. Brunner thought he did not need to have insurance on that item, and he is attempting to get insurance on that item. Mr. Brunner does not even know the location of the 1997 Magnum Marine 27 footer.

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2. With respect to Paragraph 11 of the U.S. Trustee's Motion, 5848 N. 41<sup>st</sup> Street is considered not to be property of the estate, although it may be titled in Outer Limits Investments.

3. With respect to Paragraph 12 of the U.S. Trustee's Motion, Debtors' counsel does not know where the U.S. Trustee got these five properties from. The five properties that were added are shown in the Amendment to Schedule A attached hereto. Those properties are insured for fire insurance. Debtors are in the process of attempting to provide proof that the condominiums that Todd Brunner owns are insured through the Condo Associations for Fire and Casualty Insurance but have been unable to come up with the information from the various Associations. The Debtors are continuing to work on this issue.

WHEREFORE, Debtors request that the Court deny the renewed Motion.

Dated this 12<sup>th</sup> day of August, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN

By:                     /ss/                      
Jonathan V. Goodman  
Counsel for the Debtors

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# CERTIFICATE OF PROPERTY INSURANCE

OP ID NB

DATE (MM/DD/YYYY)  
08/11/11

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

If this certificate is being prepared for a party who has an insurable interest in the property, do not use this form. Use ACORD 27 or ACORD 28.

<b>PRODUCER</b> Robertson Ryan & Assoc., Inc. Two Plaza East, Suite 650 330 East Kilbourn Avenue Milwaukee WI 53202 Steven R. Kuhnmuensch Phone: 414-271-3575 Fax: 414-271-0196		<b>CONTACT</b> NAME: PHONE (A/C No, Ext): FAX (A/C, No): E-MAIL: ADDRESS: PRODUCER CUSTOMER ID: BRUNN-3	
<b>INSURED</b>  Todd A Brunner c/o Jonathan V Goodman 135 W Wells St, Suite 340 Milwaukee WI 53203		<b>INSURER(S) AFFORDING COVERAGE</b> INSURER A: Chubb Custom Insurance Co. INSURER B: INSURER C: INSURER D: INSURER E: INSURER F:	
		NAIC #	

## COVERAGES

CERTIFICATE NUMBER: 2

REVISION NUMBER:

LOCATION OF PREMISES / DESCRIPTION OF PROPERTY (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

Locations added: 1) 3308 N 46th St, 2) 3365 N 53rd St, 3) 3360 N 55th St,  
4) 3615-17 W Roosevelt Dr, 5) 3634-36 N 51st Blvd, Milwaukee, WI

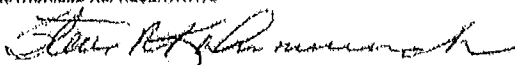
THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE		POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YYYY)	POLICY EXPIRATION DATE (MM/DD/YYYY)	COVERED PROPERTY	LIMITS
A	<input checked="" type="checkbox"/>	PROPERTY	7958875200	07/01/11	07/01/12	<input checked="" type="checkbox"/> BUILDING	\$ 10000000
		CAUSES OF LOSS				<input type="checkbox"/> PERSONAL PROPERTY	\$
		DEDUCTIBLES				<input type="checkbox"/> BUSINESS INCOME	\$
		BASIC				<input type="checkbox"/> EXTRA EXPENSE	\$
		BROAD				<input type="checkbox"/> RENTAL VALUE	\$
		<input checked="" type="checkbox"/> SPECIAL				<input type="checkbox"/> BLANKET BUILDING	\$
		EARTHQUAKE				<input type="checkbox"/> BLANKET PERS PROP	\$
		WIND				<input type="checkbox"/> BLANKET BLDG & PP	\$
		FLOOD					\$
							\$
	<input type="checkbox"/>	INLAND MARINE	TYPE OF POLICY				\$
		CAUSES OF LOSS					\$
		NAMED PERILS	POLICY NUMBER				\$
							\$
	<input type="checkbox"/>	CRIME					\$
		TYPE OF POLICY					\$
	<input type="checkbox"/>	BOILER & MACHINERY / EQUIPMENT BREAKDOWN					\$
							\$
	<input type="checkbox"/>						\$
							\$

SPECIAL CONDITIONS / OTHER COVERAGES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

## CERTIFICATE HOLDER

## CANCELLATION

OFFICE 6  Office of the United States Trustee 517 E Wisconsin Ave, #430 Milwaukee WI 53202	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE 
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ACORD 24 (2009/09)

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re:

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AMENDMENT TO SCHEDULES A and B

**Amendment to Schedule A – Real Property:**

Location of Property	Nature of Debtors' Interest	Current Value	Amount of Secured Claim
3308 N. 46 <sup>th</sup> Street Single-family brick	Fee	\$40,000.00	\$0.00

The following are jointly owned with Dion Droll:

Location of Property	Nature of Debtors' Interest	Current Value	Amount of Secured Claim
3365 N. 53 <sup>rd</sup> Street	undivided percent w/Dion Droll	\$75,000.00	\$0.00
5360 N. 55 <sup>th</sup>	undivided percent w/Dion Droll	\$45,000.00	\$0.00
3615-17 W. Roosevelt	undivided percent w/Dion Droll	\$75,000.00	\$0.00
3634-36 N. 51 <sup>st</sup>	undivided percent w/Dion Droll	\$75,000.00	\$0.00

**Amendment to Schedule B – Personal Property:**

21. **Other contingent and unliquidated claims** - \$35,000.00 claim against Legacy Bank for over paying mortgage payoff on four (4) properties.
25. **Vehicles** – 1918 Rausch & Lang electric car – in the midst of restoration. Estimated value - \$30,000.00.

We declare under penalty of perjury that we have read the foregoing amendment and that it is true and correct to the best of our knowledge, information and belief.

Dated: July 21, 2011.

  
Todd A. Brunner

  
Sharon Y. Brunner

Prepared by:  
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